

DANIEL JOHNSON, JR. (SBN 57409)
RITA E. TAUTKUS (SBN 162090)
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco CA 94105
Telephone: (415) 442-1000
Facsimile: (415) 442-1001
Email: djjohnson@morganlewis.com
Email: rtautkus@morganlewis.com

Attorneys for Plaintiff
UNIVERSITY OF PITTSBURGH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNIVERSITY OF PITTSBURGH OF THE
COMMONWEALTH SYSTEM OF HIGHER
EDUCATION d/b/a UNIVERSITY OF
PITTSBURGH

Plaintiff,

v.

VARIAN MEDICAL SYSTEMS, INC.

Defendant.

Case No. CV 08-02973 MMC

**PLAINTIFF'S SUBMISSION OF
EXHIBITS 3-9 TO THE PREVIOUSLY-
FILED DECLARATION OF RITA E.
TAUTKUS IN SUPPORT OF
UNIVERSITY OF PITTSBURGH'S
OPPOSITION TO MOTION TO
TRANSFER BY VARIAN MEDICAL
SYSTEMS, INC., PER THE COURT'S
ORDER OF AUGUST 19, 2008 (DOC.
NO. 63)**

Date: September 5, 2008
Time: 9:00 a.m.
Courtroom 7, 19th Floor

1 Pursuant to the Court's Order Granting in Part and Denying in Part Plaintiff's Administrative
2 Motion to File Exhibits Under Seal, dated August 19, 2008 (Document No. 63), University of
3 Pittsburgh ("UPitt") hereby submits for the public record Exhibits 3-9 that were previously attached
4 as exhibits to the Declaration of Rita E. Tautkus in Support of University of Pittsburgh's Opposition
5 to Motion to Transfer by Varian Medical Systems, Inc., filed on July 11, 2008 (Document No. 34).

6 I, Rita E. Tautkus, declare and state as follows:

7 1. I am Of Counsel with the law firm of Morgan, Lewis & Bockius LLP, attorneys of
8 record for Plaintiff University of Pittsburgh ("UPitt"). I am licensed to practice law before the
9 Courts for the State of California. I have direct and personal knowledge of the facts set forth in my
10 Declaration and, if called and sworn as a witness, I would competently testify to these facts.

11 2. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript
12 of the deposition of Sam David Castellino, which was taken on October 16, 2007 in the Western
13 District of Pennsylvania action, Case No. 07-0491.

14 3. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript
15 of the deposition of Michael Sing Chen, which was taken on October 16, 2007 in the Western
16 District of Pennsylvania action, Case No. 07-0491.

17 4. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the transcript
18 of the deposition of Martin J. Kandes, which was taken on September 28, 2007 in the Western
19 District of Pennsylvania action, Case No. 07-0491.

20 5. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the transcript
21 of the deposition of Stanley Mansfield, which was taken on October 17, 2007 in the Western District
22 of Pennsylvania action, Case No. 07-0491.

23 6. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the transcript
24 of the deposition of Richard Morse, which was taken on October 2, 2007 in the Western District of
25 Pennsylvania action, Case No. 07-0491.

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

--oOo--

UNIVERSITY OF PITTSBURGH,

08:58:57

Plaintiff,

vs.

No. 2:07-CV-00491-AJS

VARIAN MEDICAL SYSTEMS,

Defendant.

/

VIDEOTAPED DEPOSITION OF SAM DAVID CASTELLINO
THIS TRANSCRIPT HAS BEEN DESIGNATED CONFIDENTIAL
ATTORNEYS' EYES ONLY
Tuesday, October 16, 2007

REPORTED BY:

SUSAN F. MAGEE, RPR, CLR, CSR No. 11661

1 IN THE UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF PENNSYLVANIA

3 --o0o--

4

5 UNIVERSITY OF PITTSBURGH,

08:58:57 6 Plaintiff,

7 vs.

No. 2:07-CV-00491-AJS

8 VARIAN MEDICAL SYSTEMS,

9 Defendant.

10 /

11

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14

15 Videotaped deposition of

16 SAM DAVID CASTELLINO taken on behalf of the

17 Plaintiff, at Morgan, Lewis & Bockius, LLP,

18 2 Palo Alto Square 3000 El Camino Real,

19 Suite 700, Palo Alto, CA 94306, beginning at

20 8:58 a.m. and ending at 10:14 a.m. on

21 Tuesday, October 16, 2007, before me,

22 SUSAN F. MAGEE, RPR, CLR, CSR No. 11661.

23

24

25

08:58:27 1 P R O C E E D I N G S :

08:58:27 2

08:58:40 3 THE VIDEOGRAPHER: Good morning. Here
08:58:43 4 begins the deposition of Mr. Sam Castellino in the
08:58:47 5 matter of University of Pittsburgh vs. Varian Medical
08:58:50 6 Systems, Inc. This case is filed in the
08:58:52 7 United States District Court for the Western District
08:59:01 8 of Pennsylvania, and the case number is
08:59:04 9 2:07-CV-00491-AJS.

08:59:06 10 Today's date is October 16th, and the time
08:59:10 11 is 8:59 a.m. The location of this deposition is at
08:59:14 12 the Law Offices of Morgan Lewis in Palo Alto,
08:59:16 13 California, and this deposition is being taken on
08:59:18 14 behalf of the plaintiffs.

08:59:23 15 The videographer is Ramon Peraza appearing
08:59:25 16 on behalf of U.S. Legal Support. The court reporter
08:59:27 17 is Susan Magee appearing on behalf of U.S. Legal
08:59:27 18 Support.

08:59:29 19 Counsel, please identify yourselves for the
08:59:30 20 report and state whom you represent.

08:59:33 21 MR. PAUL: Darcy Paul of Morgan, Lewis &
08:59:41 22 Bockius for plaintiff the University of Pittsburgh.

08:59:45 23 MR. HANSEN: John Hansen from Navigant
08:59:46 24 Consulting.

25 MR. HEAFEY: Michael Heafey from Orrick,

1 SAM DAVID CASTELLINO,
2 having been duly sworn, testified as follows:

3

4 EXAMINATION BY MR. PAUL

09:02:32 5

09:02:34 6 Q. Please state for the record your full name.

09:02:37 7 A. Sam David Castellino.

09:02:40 8 Q. Mr. Castellino, what is your business

09:02:40 9 address?

09:02:48 10 A. 911 Hansen Way, Building 3.

09:02:50 11 Q. And the company that you work for is?

09:02:53 12 A. Varian Medical Systems.

09:02:55 13 Q. What's your telephone number at Varian?

09:03:00 14 A. Which phone?

09:03:03 15 Q. Any direct line that you have is sufficient.

09:03:10 16 A. It's area code (650) 424-6669.

09:03:15 17 Q. And what are your home addresses?

09:03:27 18 A. 287 Hershner Court, Los Gatos, California.

09:03:30 19 Q. And any telephone numbers at the home

09:03:30 20 address?

09:03:32 21 A. Yes.

09:03:33 22 Q. And what is that?

09:03:40 23 A. (408) 879-9341.

09:03:43 24 Q. Have you ever had your deposition taken,

25 Mr. Castellino?

EXHIBIT 4

Page 1

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

--o0o--

UNIVERSITY OF PITTSBURGH,

08:58:57

Plaintiff,

vs.

No. 2:07-CV-00491-AJS

Varian Medical Systems,

Defendant.

/

VIDEOTAPED DEPOSITION OF MICHAEL SING CHEN
THIS TRANSCRIPT HAS BEEN DESIGNATED CONFIDENTIAL

ATTORNEYS' EYES ONLY

TUESDAY, OCTOBER 16, 2007

REPORTED BY:

SUSAN F. MAGEE, RPR, CLR, CSR No. 11661

1 IN THE UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF PENNSYLVANIA

3 --o0o--
4

5 UNIVERSITY OF PITTSBURGH,

08:58:57

6 Plaintiff,

7 vs.

No. 2:07-CV-00491-AJS

8 Varian Medical Systems,

9 Defendant.

10 /

11

12

13

14

15 Videotaped deposition of MICHAEL SING CHEN
16 taken on behalf of the Plaintiff, at Morgan,
17 Lewis & Bockius, LLP, 2 Palo Alto Square
18 3000 El Camino Real, Suite 700, Palo Alto,
19 CA 94306, beginning at 10:25 a.m. and
20 ending at 4:01 p.m. on Tuesday,
21 October 16, 2007, before me, SUSAN F. MAGEE,
22 RPR, CLR, CSR No. 11661.
23
24
25

1 MICHAEL SING CHEN,
2 having been duly sworn, testified as follows:
3

4 EXAMINATION BY MR. PAUL

10:27:24 5

10:27:26 6 Q. Please state for the record your full name.

10:27:28 7 A. Michael Sing Chen.

10:27:32 8 Q. And Mr. Chen, where do you work?

10:27:34 9 A. I work at Varian Medical Systems.

10:27:38 10 Q. Okay. And what is your business address?

10:27:42 11 A. 3100 Hansen Way, Palo Alto, California.

10:27:44 12 Q. And what is your business phone number?

10:27:48 13 A. (650) 424-6161.

10:27:50 14 Q. Okay. And what is your personal address or
10:27:51 15 addresses?

10:27:57 16 A. 1436 Stanton Way, San Jose.

10:28:00 17 Q. Okay. And what is your personal phone
10:28:00 18 number?

10:28:02 19 A. Home phone?

10:28:02 20 Q. Home phone.

10:28:06 21 A. (408) 416-3611.

10:28:08 22 Q. Okay. How long have you lived at this
10:28:09 23 residence?

10:28:14 24 A. Since April of 2006.

25 Q. Okay. And have you ever had your deposition

EXHIBIT 5

IN THE UNITED STATES DISTRICT
NORTHERN DISTRICT OF CALIFORNIA

UNIVERSITY OF PITTSBURGH,)
)
Plaintiff)
) Case No.
vs.) 07-CV-0791 (AJS)
)
VARIAN MEDICAL SYSTEMS,) Western District of
) Pennsylvania
)
Defendant.)
_____)

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF MARTIN J. KANDES
September 28, 2007

Reported by:

Rick Posner

CSR No. 5040

IN THE UNITED STATES DISTRICT
NORTHERN DISTRICT OF CALIFORNIA

1 UNIVERSITY OF PITTSBURGH,)
2)
3)
4 Plaintiff)
5) Case No.
6 vs.) 07-CV-0791 (AJS)
7)
8 VARIAN MEDICAL SYSTEMS,) Western District of
9) Pennsylvania
10)
11)
12 Defendant.)
13)
14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

Deposition of MARTIN J. KANDES taken
on behalf of the Plaintiff at
3000 El Camino Real, Suite 700
Palo Alto, CA beginning at 9:06 a.m.
and ending at 2:13 p.m. on Friday,
September 28, 2007 before Rick Posner,
CSR No. 5040.

1 MARTIN J. KANDES,

2 Having been first duly sworn, was examined and
3 testified as follows:

4

08:39 5

6 THE VIDEOGRAPHER: Good morning, here
7 begins the deposition of Mr. Martin Kandes in the
8 matter of University of Pittsburgh versus Varian
9 Medical Systems, Inc., as filed in the United States
09:06 10 District Court for the Western District of
11 Pennsylvania. The case number is 2:07-CV-00491-AJS.

12 Today's date is September 28th, the time
13 is 9:05 a.m. This deposition is taking place at the
14 law offices of Morgan, Lewis & Bockius in Palo Alto,
09:06 15 California and is being taken on behalf of the
16 plaintiffs. The videographer is Ramon Peraza
17 appearing on behalf of US Legal Support. The court
18 reporter is Rick Posner appearing on behalf of US
19 Legal Support.

09:07 20 Will counsel please identify yourselves
21 for the record.

22 BY MR. JOHNSON:

23 Q Daniel Johnson, Jr., for plaintiff,
24 University of Pittsburgh, assisting me --

09:07 25 MR. GEX: Is Gary Gex.

09:12 1 what did your work entail?

2 A I worked in the radiation oncology
3 department and I was the radiation safety officer,
4 and I was also involved in the diagnostic radiology

09:13 5 department, calibrating x-ray machines, linear
6 accelerators, typical things that medical physicists
7 do.

8 Q You left Hartford in '76, then where did
9 you go?

09:13 10 A Came here to Palo Alto Medical Foundation
11 across the way, now down the street.

12 Q How long were you there.

13 A Until '82.

14 Q And what did you do for Palo Alto Medical
09:13 15 Foundation?

16 A Same thing, I was a medical physicist.

17 Q Then you went to Varian?

18 A I did, I went to Varian April 12th, 1982.

19 Q What was your first position?

09:13 20 A Product manager.

21 Q What type of product?

22 A First one, I believe, was a simulation
23 product, we acquired a company, and I was the
24 product manager for that.

09:13 25 Q What were the simulations relating to?

1 U.S. Legal Support, Inc.
180 Montgomery Street, Suite 2180
2 San Francisco, California 94104

3

4 MARTIN J. KANDES
c/o Varian Medical Systems
5 3100 Hansen Way, M/S E-175
Palo Alto, CA 94304

6

7 Re: University of Pittsburgh v. Varian Medical Systems

8 Dear MARTIN J. KANDES,

9

10 The original transcript of your deposition taken in
the above matter is available at this office for your
11 review. If it is more convenient, you may read counsel's
copy.

12

13 In the event you have not read, corrected, and signed
your deposition within thirty (30) days of receipt of this
14 letter, it may be used with the full force and effect as
though it had been read, corrected, and signed.

15

If you have any questions regarding this matter, please
16 contact this office at the telephone number below.

17

18 Sincerely,

19

20 Rick Posner, CSR No. 5040

21 cc: All counsel present
Original: Original Transcript

22

23

24

25

EXHIBIT 6

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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UNIVERSITY OF PITTSBURGH,)	
)	
Plaintiff,)	
)	
vs.)	No. 07-CV-0791 (AJS)
)	
VARIAN MEDICAL SYSTEMS,)	
)	
Defendant.)	
_____)	

CONFIDENTIAL TESTIMONY - PURSUANT TO PROTECTIVE ORDER
VIDEOTAPED 30(b)(6) DEPOSITION OF STANLEY MANSFIELD

Palo Alto, California

Wednesday, October 17, 2007

Reported by:
KELLI COMBS
CSR No. 7705

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 ---o0o---

4
5 UNIVERSITY OF PITTSBURGH,)
6 Plaintiff,)
7 vs.)
8 VARIAN MEDICAL SYSTEMS,)
9 Defendant.)
10 _____)

No. 2:07-CV-0791 (AJS)

11
12
13 Deposition of STANLEY MANSFIELD, taken on behalf of
14 Plaintiff, at Two Palo Alto Square, 6th floor, Palo
15 Alto, California, beginning at 9:21 a.m., and ending at
16 6:21 p.m. on Wednesday, October 17, 2007, before Kelli
17 Combs, CSR 7705.

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1 opportunities, so I worked at Peterbilt Motors.

2 Q Peterbilt Motors?

3 A Uh-huh, in Newark, and also worked with
09:33:46 4 the Federal Aviation Administration prior to getting
5 a Bachelor's degree.

6 Q What did you do at the FAA?

7 A It was their engineering division, so they
8 did a variety of things related to type
09:34:01 9 certification of aircraft, including flight test and
10 mechanical systems.

11 Q Did you ever do any flying on your own or
12 just regulatory work?

13 A I sat in the right seat for flights.

09:34:12 14 Q That's fun. All right.

15 What after --

16 What did you do for employment after Cal
17 Poly?

18 A After graduation, I started working at
09:34:27 19 Varian radiation division in October 1978.

20 Q In Palo Alto?

21 A That's correct.

22 Q So in '78.

23 Now, what was your role when you first
09:34:46 24 started in -- at Varian Medical Systems of Palo Alto
25 1978 here?

EXHIBIT 7

Page 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

--oOo--

UNIVERSITY OF PITTSBURGH,

Plaintiff,

vs.

No. 2707-CV-00491-AJS

VARIAN MEDICAL SYSTEMS, INC.,

et al.,

Defendant.

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CONFIDENTIAL - ATTORNEYS' EYES ONLY

DEPOSITION OF RICHARD MORSE, Ph.D.

Tuesday, October 2, 2007

REPORTED BY:

YVONNE FENNELLY, CRP, CSR NO. 5495

1 APPEARANCES (Continued):

2

3 ALSO PRESENT: RAMON PERAZA, Videographer

4

5 TAKEN AT:

6

MORGAN, LEWIS & BOCKIUS, LLP

7

2 Palo Alto Square, Suite 700

8

3000 El Camino Real, California 94306

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--oOo--

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EXHIBIT 8

Page 1

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

---oOo---

UNIVERSITY OF PITTSBURGH,

Plaintiff,

vs.

CASE NO. 07-CV-0791

VARIAN MEDICAL SYSTEMS,

Defendant.

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF HASSAN MOSTAFAVI

FRIDAY, SEPTEMBER 21, 2007

REPORTED BY: ANDREA M. IGNACIO HOWARD, CSR, RPR
CSR LICENSE NO. 9830

1 IN THE UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 ---oOo---

4
5 UNIVERSITY OF PITTSBURGH,

6 Plaintiff,

7 vs.

CASE NO. 07-CV-0791

8 VARIAN MEDICAL SYSTEMS,

9 Defendant.

10 _____/

11

12

13

14 VIDEOTAPED DEPOSITION OF HASSAN MOSTAFAVI

15 taken on behalf of Plaintiff, MORGAN LEWIS &

16 BOCKIUS, LLP, 2 Palo Alto Square, Suite 700,

17 Palo Alto, California, beginning at 9:15 a.m., and

18 ending at 3:11 p.m., on September 21, 2007, before

19 me, ANDREA M. IGNACIO HOWARD, CSR, RPR,

20 CSR License No. 9830

21

22

23

24

25

09:23:33 1 Q All right.

09:23:37 2 So about 1981 or so you went somewhere else?

09:23:38 3 A Yes.

09:23:42 4 Q Where did you go?

09:23:44 5 A Three other people from Systems Control and
09:23:51 6 myself started a company down in Los Gatos, and I was
09:23:55 7 there until end of '95.

09:24:00 8 Q And what was the name of that company?

09:24:01 9 A Tau Corporation.

09:24:02 10 Q Spell that for me?

09:24:03 11 A T-A-U, Corporation.

09:24:07 12 Q And what was the business of Tau Corporation?

09:24:10 13 A Web technology development for government
09:24:17 14 contracting, and also products in image processing and
09:24:24 15 navigation systems.

09:24:26 16 Q Okay. Now, 1995 you left Tau?

09:24:27 17 A Yeah.

09:24:29 18 Q And for whom did you go to work?

09:24:32 19 A Actually, I was at a company called
09:24:38 20 Systems -- I'm sorry -- Image Science Corporation, and
09:24:46 21 a -- consulting, in addition to that, called Imetric.

09:24:46 22 Q All right.

09:24:50 23 How long were you with Image Sciences?

09:24:51 24 A Two, two years.

25 Q '95 to '97?

09:24:53 1 A That's right.

09:24:54 2 Q All right.

09:24:55 3 And then you consulted?

09:25:02 4 A A part of my consulting was -- Imetric was
09:25:04 5 the entity I used for consulting.

09:25:04 6 Q All right.

09:25:06 7 And how long did you consult?

09:25:08 8 A For the two years.

09:25:10 9 Q Okay. Then in '97, for whom were you
09:25:12 10 employed?

09:25:21 11 A I joined Varian in January '98.

09:25:23 12 Q In what capacity?

09:25:25 13 A As a senior scientist.

09:25:29 14 Q And were you assigned to any particular
09:25:34 15 project?

09:25:41 16 A I was in the research lab and pretty much had
09:25:44 17 to propose my own research projects, so --

09:25:45 18 Q Okay.

09:25:48 19 A -- so I wasn't assigned anything, but the --
09:25:56 20 I worked on targeting. In general, target --
09:26:02 21 image-based targeting of tumors for....

09:26:02 22 Q All right.

09:26:07 23 Now, when you arrived at Varian in January of
09:26:16 24 1998, did Varian possess any technology that targeted
25 tumors, if you know?

EXHIBIT 9

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

--oOo--

UNIVERSITY OF PITTSBURGH,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	2:07-CV-00491-AJS
VARIAN MEDICAL SYSTEMS, INC.,)	
)	
Defendant.)	

DEPOSITION OF GEORGE ZDASIUK, Ph.D.

CONFIDENTIAL-ATTORNEYS' EYES ONLY

Thursday, October 4, 2007

REPORTED BY:

MARYANN H. VALENOTI, RPR, CSR #11266

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF PENNSYLVANIA

3 --oOo--

4 UNIVERSITY OF PITTSBURGH,)
5 Plaintiff,)
6 vs.) Case No.
7 VARIAN MEDICAL SYSTEMS, INC.,) 2:07-CV-00491-AJS
8 Defendant.)

9
10
11 Deposition of GEORGE ZDASIUK, Ph.D., taken
12 on behalf of the Plaintiff, at Morgan,
13 Lewis & Bockius, LLP, Two Palo Alto
14 Square, Suite 700, 3000 El Camino Real,
15 Palo Alto, California, beginning at 9:16
16 a.m. and ending at 2:18 p.m., on Thursday,
17 October 4, 2007, before Maryann Hope
18 Valenoti, RPR, CSR #11266.
19
20
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1 P R O C E E D I N G S

09:11:10 2 THE VIDEOGRAPHER: The date is October 4,
09:16:12 3 2007. The time is 9:16 a.m. This begins the
09:16:16 4 videotaped deposition of Mr. George Zdasiuk. The
09:16:20 5 location of this deposition is at the offices of
09:16:23 6 Morgan, Lewis located at 2 Palo Alto Square, Suite
09:16:27 7 700, 3000 El Camino Real, Palo Alto, California
09:16:32 8 94306.

09:16:34 9 This deposition is in regards to
09:16:36 10 University of Pittsburgh versus Varian Medical
09:16:38 11 Systems, Inc., as filed in the United States
09:16:40 12 District Court for the Western District of
09:16:42 13 Pennsylvania. Case Number is 07-CV-00491. The
09:16:50 14 videographer is Sean Grant of U.S. Legal Support.
09:16:52 15 The court reporter is Maryann Valenoti also of U.S.
09:16:55 16 Legal Support.

09:16:59 17 MR. JOHNSON: Daniel Johnson, Jr., on
09:17:00 18 behalf of the University of Pittsburgh.

09:17:03 19 MR. POPPE: Matthew Poppe for Defendant
09:17:05 20 Varian Medical Systems.

09:17:07 21 THE VIDEOGRAPHER: The court reporter may
09:17:08 22 now swear in the witness.

09:17:09 23 GEORGE ZDASIUK, sworn.

09:17:09 24 EXAMINATION BY MR. JOHNSON

09:17:20 25 Q. Would you state your name for the record,

09:19:28 1 Technology Officer, and Director of the Ginzton

09:19:31 2 Technology Center.

09:19:37 3 Q. Tell me your educational background.

09:19:39 4 A. I have an undergraduate degree in
09:19:41 5 engineering science from the University of Toronto.

09:19:44 6 I have a master's in physics from the University of
09:19:46 7 Toronto. I have a Ph.D in applied physics from
09:19:50 8 Stanford University.

09:19:52 9 Q. When did you get your undergraduate
09:19:54 10 degree, what year?

09:19:55 11 A. 1974.

09:19:59 12 Q. And then you have a master's from
09:20:02 13 University of Toronto as well?

09:20:04 14 A. That's correct.

09:20:05 15 Q. When did you get that?

09:20:06 16 A. I believe it was '75.

09:20:08 17 Q. When did you begin your Ph.D. course at
09:20:11 18 Stanford?

09:20:13 19 A. At the end of 1975.

09:20:18 20 Q. When did you obtain your Ph.D.?

09:20:21 21 A. I believe it was -- I completed the work
09:20:24 22 in late 1980, my defense, and the degree was
09:20:27 23 awarded I believe in the early 1981.

09:20:32 24 Q. Was there a particular area of emphasis
09:20:35 25 that you pursued for your Ph.D.?

09:20:38 1 A. Yes.

09:20:39 2 Q. What was that?

09:20:40 3 A. Nonlinear optics and optical spectroscopy.

09:20:48 4 Q. After you obtained your Ph.D., for whom
09:20:51 5 were you employed?

09:20:52 6 A. Varian Associates at that time.

09:20:55 7 Q. In what capacity?

09:20:57 8 A. As a researcher.

09:21:00 9 Q. How long did you operate as a researcher?

09:21:08 10 A. I'm not sure I understand that question.

09:21:09 11 Q. You were a researcher, that position you
09:21:13 12 held as researcher, how long did you hold?

09:21:15 13 A. That position was Engineer A specifically,
09:21:16 14 and I held that for maybe a year or so.

09:21:21 15 Q. Then what was your next position?

09:21:23 16 A. Senior Engineer B.

09:21:29 17 Q. How long did you hold that position?

09:21:30 18 A. I don't remember exactly.

09:21:32 19 Q. Well, was it more than two years?

09:21:37 20 A. It may have been a year or two. I don't
09:21:39 21 know exactly.

09:21:40 22 Q. Okay. Then what was your next position?

09:21:42 23 A. I believe I was -- I don't remember the
09:21:50 24 exact title. I think it was Associate Lab Director
09:21:56 25 or something like that.